

Health Insurance Exchange Stakeholder Engagement Strategy

PURPOSE

The paper outline the West Virginia Offices of the Insurance Commissioner's (OIC) strategy for a statewide informational and stakeholder engagement campaign on the health insurance exchange. The OIC believes that providing information and listening directly to stakeholders as part of the design and development phase is paramount for success. Therefore, the OIC is undertaking a project to provide information to and gather input from stakeholders around the state.

These meetings will inform the public about what is in the Affordable Care Act (ACA) concerning the exchange; educate the public about what the OIC has accomplished to date on exchange planning; outline critical areas where stakeholder input is needed; receive stakeholder input and gather public ideas on the exchange; and, from the information gathered in these meetings and prior, develop community of interest policy groups to further develop exchange plans.

BACKGROUND

The OIC has been designated by Governor Joe Manchin III to research and develop the State's strategy for the health insurance exchange. The premise of the statewide public information and engagement campaign is based on the OIC's policy of open government and stakeholder involvement. The OIC is dedicated to making this process as transparent as possible. The OIC will go to great lengths to ensure that all perspectives are heard. These discussions will focus on the policy and operational decisions that must be made to ensure the successful implementation of a health insurance exchange in West Virginia.

In addition, the ACA requires that an exchange engage stakeholder groups. While the exchange has not yet been developed, we feel it is absolutely necessary to maintain as open a process as possible starting with the exchange planning stage and moving forward in perpetuity as the exchange is operational.

The Office of Consumer Information and Insurance Oversight (OCIIO) released an exchange planning grant in early August, which the OIC has applied for. Beyond requiring the grantees to outline how stakeholders would be engaged, the grant also stipulated that, "Consumers and other stakeholders must have meaningful input into the planning, implementation, and evaluation of the project." The OIC clearly outlined in West Virginia's grant application resources that would be dedicated to stakeholder engagement with grant funding. Another source for exchange planning funding is West Virginia's State Health Access Program (SHAP) grant. The costs associated with this series of stakeholder meetings will be covered through the SHAP grant.

STAKEHOLDER ENGAGEMENT PLAN

The West Virginia Offices of the Insurance Commissioner will be hosting a series of public information and engagement meetings throughout the Fall of 2010. The format of each meeting will be based on the following agenda:

1. Introduction of OIC Staff

2. Word from OIC Leadership
3. Presentation: Exchange and ACA
4. Presentation: WV Exchange Progress and Outstanding Exchange Issues
5. Stakeholder Questions and Ideas

The following locations were selected based on population and regional distribution.

Stakeholder Engagement Locations

Fairmont- November 30 - WVHTC

Huntington- December 2- Riverside Suite at the Big Sandy Arena

Wheeling- December 7- Wilson Lodge at Oglebay Resort & Conference Center

Beckley, December 14, 2010, Beckley-Raleigh County Convention Center, Conference Room A

Shepherdstown, January 6, 2011, Shepherd University, Storer Ballroom

Charleston, January 10, 2011, Capitol Complex, Building 7, Capitol Room

*All meetings will be from 6-8pm.

**All meetings are tentative and subject to change.

***Subsequent meetings are being planned for additional locations throughout the state.

Several strategies will be utilized to promote these meetings. First, a notification will be issued in the state register. Second, a press release will go around to news publications around the state. Third, a letter will be sent to each member of the Legislature specifying when these meetings will take place and encouraging their attendance. Finally, various stakeholder organizations/associations will be contacted with the request that they encourage their members to attend these meetings and assist in promoting public attendance. To carry out this request, a letter will be sent to the following associations/organizations requesting their assistance:

- WV Chamber of Commerce
- Local Chambers of Commerce
- Other Business Associations/Organizations
- AARP
- WV for Affordable Health Care
- AFL-CIO
- NAIFA
- NAHU
- BIG I
- Carriers
- Hospital Association
- Medical Association
- Primary Care Association
- Nurses Association
- Constituent State Agencies
- Legal Aid
- WV Academy of Family Physicians
- WV Council on Churches

- Other Faith Based Organizations

Other planning necessities for these meetings include the development of a stakeholder meeting survey, meeting outreach materials, and stakeholder engagement exchange link on the OIC website.

The OIC also plans to start issuing a quarterly update for key members of the Legislature, Governor's Office and state agency heads. This will both inform key government stakeholders of exchange progress while also promoting measures by which interested parties can become engaged in the process.

To coordinate these meetings and facilitate this early stakeholder engagement, the OIC has asked the Center for Entrepreneurial Studies and Development, Inc. (CESD) to assist with the project. CESD's services include professional facilitation as well as technical assistance with design and implementation of the planning sessions to include results analysis and reporting.

CESD will partner with the OIC staff to design, hold and report on the stakeholders planning session. Projects of this nature have challenges and are difficult to predict what the response will be or to what degree diverse input will be offered. The following are key assumptions regarding the project.

- CESD will do its best to seek participants for each session. The final number of participants can vary based on a number of factors including timing of the event both as to the day and hours, weather, final decision to attend by the individual, etc.
- CESD will strive to find a suitable location in each location that balances cost with convenience for the participants.
- The expected time for a session should be no more than two hours. There must be ample time for both information sharing and participant feedback.

This contract will be covered by SHAP funds. This approach is thought necessary given the amount of work involved in planning and coordinating these meetings. Given other responsibilities it will be very difficult for the current staff to perform these functions on top of existing work. The exchange planning grant has in it the development of a more verbose exchange facilitation contract to carry out these and other functions related to exchange planning and development. Decisions on how to proceed with this broader facilitation contract have not yet been made.

Community of Interest Exchange Policy Groups

The stakeholder meetings around the state will serve to start a dialogue with interested groups/associations and the public concerning the exchange. The next phase of stakeholder engagement will be to create community of interest exchange policy groups. These subgroups will have designated members but will also allow for those interested to self select in participation so as to not preclude an interested party from a group for which they feel they have valuable input. Each policy group will have subgroups within it to address the myriad of issues facing the exchange. The OIC has built into the exchange planning grant a facilitation contract to assist in coordinating these meetings. A more defined strategy regarding how to manage these discussions will be developed at a later date.

While the statewide stakeholder meetings will contribute to the design of these groups, it is envisioned that the following categories will be covered:

Access and Outreach	Plan Development and Assessment	Budget and Finance	Operations
<ul style="list-style-type: none"> • Navigator Programs • Role of Agents • Role of DHHR County Staff • 24/7 Telephone Hotline • Public Interface of Exchange • Literacy Issues • Marketing • Education and Outreach • Community Access Points • Market Metrics for Comparison • FAQs, Tutorials, Common Terms • Social media • Direct Deposits • Exchange, Provider, Plan Financial Transparency • Employer Exchange Kit • Carrier Complaint Tool • CompareCare Interface • Provider, Carrier, and Consumer • Mandate Exemption 	<ul style="list-style-type: none"> • Determining Qualified Health Plan • Actuarial Value of Plans (Precious Metal Tiers) • Mandatory Services (state and federal) • Rating of Plans • Carrier Menu Layout • Plan Competition • Process for Plan Submission • Process for Plan Change • External Market Regulation • Quality Incentives for Providers • Negotiation of Provider Fees • Provider Network Adequacy • Plan Standardization • CHIP, Medicaid, Exchange Transition Plan • SHOP Exchange vs Individual Exchange Plans 	<ul style="list-style-type: none"> • Sustainability Issues • Fees, Charges • Staff Levels • Navigator Grants • Planning Grants • SHAP Funding • RFP Assessment • Agent/Broker Commissions • Processing Payments to Carriers • Adverse Selection • Multistate Vendor Agreements • Administrative Costs 	<ul style="list-style-type: none"> • Premium Aggregator • Collection and Remittance • Consumer Payment Methods • Federal Subsidy and Tax Credits for Employers • Federal System Interfaces • State System Interfaces • Combining Small Group/ Individual • Governance • Regional Exchanges • Active Purchase vs. Market Organizer • Exchange Only or Parallel Market • Basic Health Plan Option • Regulation of Market • Role of State Agencies

Request for Comment

In conjunction with the statewide stakeholder meetings, the agency had developed a request for comment that is in the State Register and on the OIC website. This first round of public comments is scheduled to last from November 30 through January 11. The State Register is published weekly to help

citizens keep up-to-date on the meetings, rule making and other official actions of state government agencies, boards and commissions.

Section 1311 of the Affordable Care Act requires that an Exchange consult with stakeholders to ensure balanced representation among interested parties. While an official Exchange has not yet been developed, the OIC feels that the planning and development process would benefit from a formalized request for comment. Such input will be requested on a parallel track to the statewide stakeholder meetings to maximize public input at this early stage.

To assist interested parties in responding, this request for comment will outline specific areas in which the OIC is particularly interested. Those commenting should use the questions below to provide the OIC with relevant information for the development of regulations regarding the Exchange-related provisions in Title I of the Affordable Care Act. However, it is not necessary for those commenting to address every category and input may also address additional issues under the Exchange-related provisions in Title I of the Affordable Care Act.

Specific areas in which the OIC is particularly interested include the following:

- Data elements and policy issues that should be sought in exchange planning
- Implementation Timeframes and Considerations
- Governance
- Roles of state agencies
- Ancillary exchange functions
- Consumer information
- Role of agent, navigators
- Availability to state employees
- Negotiate plan premiums
- Network adequacy
- Quality measures
- Marketing
- Eligibility and Enrollment
- Nationwide Plans
- Inside/outside regs
- Multi-State exchange
- Mandated benefits
- Funding of operations
- Combine ind. small groups
- Large groups
- Negotiate provider prices
- Competition

- Consumer Disclosure
- Multi-state offering of plans
- Collection and Remittance
- Medicaid/CHIP Issues
- Outreach
- Free Choice vouchers
- Rating Areas
- Employer Participation
- Consumer Experience
- Risk Adjustment, Reinsurance, and Risk Corridors
- All payer claims database usage
- Master Client Index
- Consumer Privacy Protection

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